



1299 Pennsylvania Avenue, NW
Washington, DC 20004.2402
www.howrey.com

Brian A. Rosenthal
Partner

202.383.7108
rosenthalb@howrey.com

March 24, 2008

VIA ELECTRONIC FILING

Hon. Barbara S. Jones
United States District Court
500 Pearl Street
New York, NY 10007-1312

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 1:08-cv-2526

Dear Judge Jones,

We represent Plaintiff U.S. Philips Corporation ("Philips") in the above-referenced actions. We write in response to Pantech Wireless, Inc.'s Motion to Compel, filed in *U.S. Philips Corp. v. Pantech Wireless, Inc.*, Civil Case No. 1:08-cv-2526 (the "Pantech Litigation"), on February 29, 2008.¹

We are writing to Your Honor because of the unique procedural position we find ourselves in with the transfer of the Pantech Litigation. Pantech's Motion to Transfer was granted by Judge Shapiro in the Eastern District of Pennsylvania on the same day Pantech filed its Motion to Compel. Philips' opposition to Pantech's Motion would have been due on March 17, 2008, had the case not been transferred. However, because the Pantech litigation had not yet been assigned to any Judge on March 17, with the consent of LG, Philips did not file any response.

Philips wants to address Pantech's Motion to Compel in a timely manner and as the Pantech Litigation has just recently been referred to Your Honor we would like to take this opportunity to address Pantech's Motion.

Pantech's Motion to Compel is solely focused on Philips' privilege log, originally served on November 28, 2007 (*see* Ex. A, Letter to Peter Kirk, dated November 28, 2007) and

¹ Pantech's Motion to Compel is located at docket entry numbers 72, 73, and 74 in the recently transferred Pantech case.

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supplemented on December 6, 2007 (*see* Ex. B, Letter to Peter Kirk, dated December 6, 2007), and most recently on February 29, 2008 (*see* Ex. C, Letter to Peter Kirk, dated February 29, 2008). Pantech raises eight issues with Philips' privilege log, most of which have already been resolved between the parties.² The eight issues are: (1) whether Philips identified documents that were redacted for privilege on its privilege log; (2) whether Philips properly redacted documents obtained from the inventor of the patent-in-suit, Dr. Peter Vogel; (3) whether Philips properly identified all redactions on its produced documents; (4) whether Philips properly correlated the redacted documents to the privilege log entries; (5) whether Philips properly withheld documents obtained from Jan van der Meer, an employee of Philips; (6) whether Philips' privilege log differentiates between U.S. attorneys and foreign patent agents; (7) whether Philips's privilege log provides sufficient bases for redacting and withholding documents based on privilege; and (8) whether Philips has sufficiently established joint defense agreements pursuant to which it is withholding documents. *See* Pantech's Mot. to Compel, pp. 1-13.

Philips has addressed all of the issues raised by Pantech, and has resolved a majority of them rendering much of Pantech's Motion to Compel moot. Below is a brief description of the work Philips has done to address Pantech's Motion to Compel.

Issues 1 & 4 – Redacted Documents Have Always Been Listed on Philips' Privilege Log and Philips has Correlated its Redactions to Entries on the Privilege Log

Pantech raises two issues with Philips' privilege log that are much intertwined. First, Pantech asserts that with the exception of three documents, Philips did not list the redactions it made on its privilege log. Second, Pantech asserts that Philips did not correlate its redacted documents with entries on its privilege log.

With respect to Pantech's first issue, Philips has always listed the documents it redacted on the privilege log, since it first produced its privilege log on November 28, 2007. Evidence of Philips' diligence in listing all the documents and redactions it withheld during the Pantech Litigation is clear by the sheer size and completeness of the log itself. Consisting of more than 25,000 entries, Philips privilege log took over six months to complete. Philips was thorough and comprehensive, taking its responsibilities under the Federal Rules of Civil Procedure and the Local Rules of the Eastern District of Pennsylvania and the Southern District of New York seriously.

To address Pantech's concern, Philips agreed to correlate each redacted document to its entry on the privilege log. Philips' February 29 supplemental privilege log specifically identifies

² During meet-and-confers and in correspondence exchanged *prior* to Pantech filing this motion, Philips confirmed that several of Pantech's complaints with Philips' privilege log would be addressed in its supplementation on February 29, 2008.

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each redacted document by bates-number. As such, issues number one and four raised in Pantech's Motion to Compel are moot.

Issue 2 – Documents Obtained from Dr. Peter Vogel

Pantech's Motion to Compel challenges a number of documents produced by Philips that were collected from Dr. Peter Vogel, the inventor of the patent-in-suit. Specifically, Pantech challenged a series of Dr. Vogel's documents that Philips produced with redactions, alleging that those redactions are improper.

Pantech appears to have disregarded the descriptions Philips provided on its privilege log of the documents that were collected from Dr. Vogel and ultimately redacted. Specifically, Philips identified the redactions as Dr. Vogel's handwritten notes prepared at the direction of Philips' attorneys. (*See, e.g.*, Ex. D, excerpts from Philips' December 6, 2007 Privilege Log, entries 21655 and 21666). However, in an effort to fully address this issue with Pantech, Philips did a thorough review of the documents collected from Dr. Vogel that were redacted. Philips originally understood that Dr. Vogel reviewed a series of references and made handwritten notes on these references at the direction of various Philips attorneys. After thorough investigation, Philips learned that some of the handwritten notes were not made at the direction of an attorney or in an effort to seek legal advice. As such, Philips produced these documents in unredacted form to Pantech. (*See* Ex. E, Letter to Peter Kirk, dated March 7, 2008.) Accordingly, Pantech's Motion to Compel on this issue is moot.

Issue 3 – Redactions Have Always Been Indicated on Redacted Documents Produced by Philips

In its Motion to Compel, Pantech alleges that Philips has produced redacted documents that do not indicate that any redaction has been made on the document, *i.e.*, certain documents contain "white-on-white" redactions. This assertion is untrue. Philips has stated numerous times in letters and during meet-and-confers, and states now for this Court, that Philips has never produced any document to Pantech that has contained so-called "white-on-white" redactions. (*See* Ex. F, Letter to Peter Kirk, dated February 19, 2008; *see also* Ex. G, Letter to Matthew Leary, dated March 18, 2008.) Every redacted document produced by Philips has contained a box with an "X" through it to indicate the redaction. (*See, e.g.*, Ex. H, PH_PAN 0000028-37.) Such markings were made by Philips' electronic document management system, so each redaction is consistent. Pantech's claim of so-called "white-on-white" redactions is without basis. As such, Pantech's Motion to Compel on this issue is moot.

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Issue 5 – Documents Authored or Received by Jan van der Meer

Pantech identifies a series of entries on Philips' privilege log, for which Jan van der Meer, an employee of Philips, was the only individual identified as an attorney who authored or received the document. Pantech asserts that these documents are not privileged because Jan van der Meer is not an attorney.

Philips originally withheld these documents as privileged based on its understanding that Mr. van der Meer had obtained a legal degree on or around 2001. However after Pantech raised this issue with Philips for the first time in its Motion to Compel, Philips investigated whether Mr. van der Meer had obtained a legal degree on or around 2001. Philips' investigation revealed that Mr. van der Meer had not obtained a legal degree, and as such Philips produced the 46 documents for which Mr. van der Meer was the only individual identified as an attorney who authored or received the document, which were originally withheld on that basis. (*See* Ex. I, Letter to Peter Kirk, dated March 15, 2008.) Because Philips has produced these documents, Pantech's Motion to Compel on this issue is moot.

Issue 6 – U.S. Attorneys and Foreign Patent Agents

Pantech asserts that Philips' privilege log is deficient because it does not distinguish between U.S. attorneys and foreign patent agents. Pantech's basis for this assertion is that some foreign patent agents are not afforded privilege because they are not licensed attorneys.

This challenge to Philips' privilege log, involves literally thousands of entries and 20 different countries. Recognizing that Pantech's challenge is massive in scale and complicated by the fact that U.S. law recognizes privilege for foreign patent agents as a matter of comity if the law of the foreign country recognizes the privilege, Philips is working with Pantech to narrow the scope of Pantech's challenge. In an effort to resolve this dispute in an efficient manner, given the comprehensive nature of Philips' privilege log and the late hour of this argument from Pantech,³ Philips offered to provide more detail about the title and position of the individuals identified as attorneys on its privilege log of most concern to Pantech. On March 11, 2008, Pantech identified several categories of documents for which it would like more information about the attorneys listed on Philips' privilege log associated with these categories of documents. Philips is working to provide the information requested by Pantech. As discussed with Pantech, confirming this information will take some time, given the size of Philips and the number of entries identified by Pantech.

³ Philips first served its privilege log on November 28, 2007. Pantech did not raise this issue, or bring many of the concerns identified in its Motion to Compel to Philips' attention, until February 2008, the end of fact discovery in Pantech. Had Pantech raised these issues in a timely manner, many of the issues in this motion could have been addressed without having to burden this Court's resources.

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To be clear, courts have recognized that privilege attaches to communications with foreign patent agents in at least two circumstances. First, privilege will attach if the foreign patent agent is “acting under the authority and control of a U.S. attorney.” *Bristol-Myers Squibb v. Rhone Poulenc Rorer*, 1998 U.S. Dist. LEXIS 4213, *1 (S.D.N.Y. April 2, 1998) (citing *Status Time Corp. v. Sharp Electronics Corp.*, 95 F.R.D. 27, 31-33 (S.D.N.Y. 1982).) Second, privilege will attach if the communication involves a “foreign patent application,” because “as a matter of comity, the law of that foreign country is considered regarding whether that law provides a privilege comparable to the attorney-client privilege.” *Id.* at *2; *Burroughs Wellcome Co. v. Barr Labs., Inc.*, 143 F.R.D. 611, 616-17 (E.D.N.C. 1992) (citing *Duplan Corp. v. Deering Milliken, Inc.*, 397 F. Supp. 1146, 1167-68 (D.S.C. 1974); *Santrade, Ltd. v. General Electric Co.*, 150 F.R.D. 539, 547 (E.D.N.C. 1993). As long as the privilege of the foreign country does not offend United States public policy, courts will uphold the privilege. *Bristol-Myers*, 1998 U.S. Dist. LEXIS 4213 at *2-3.

Moreover, in the key jurisdictions at issue in this litigation, including Germany, the United Kingdom, and the Netherlands, patent agents do enjoy privilege. *See Astra Aktiebolag v. Andrx Pharms., Inc.*, 208 F.R.D. 92, 99-100 (S.D.N.Y. 2002) (“German law promises confidentiality to communications between a patent attorney or agent and his clients.”); *see also Golden Trade, S.r.L. v. Lee Apparel Co.*, 143 F.R.D. 514, 524 (S.D.N.Y. 1992); *see also* 1 EDNA SELAN EPSTEIN. THE ATTORNEY-CLIENT PRIVILEGE AND THE WORK-PRODUCT DOCTRINE 762 (5th ed. 2007) (The attorney client privilege in the United Kingdom (“UK”) is akin to the attorney client privilege in the United States); *see also Johnson Matthey, Inc. v. Research Corp.*, 2002 U.S. Dist. LEXIS 13560, *24 (S.D.N.Y. 2002) (The communications between a British patent agent and his client are protected under the attorney client privilege); *see also Burroughs Wellcome Co. v. Barr Labs., Inc.*, 143 F.R.D. 611, *624 (E.D.N.C. 1992); *see also Tulip Computers Int’l v. Dell Computer, Corp.*, 210 F.R.D. 100 (D.Del. 2002) (The Netherlands Code of Civil Procedure, Article 165 states that “certain individuals can invoke the privilege of non-disclosure.” Article 165 goes on to state that the privilege attaches to “those persons who are obligated to maintain confidentiality *as a result of their profession* with respect to information which has been entrusted to them *in the capacity of their profession*.”).

Further, while Pantech's motion focuses primarily on foreign patent agents, to the extent Pantech seeks communications with non-U.S. lawyers, those communications are also protected by privilege. *See* 1 EDNA SELAN EPSTEIN. THE ATTORNEY-CLIENT PRIVILEGE AND THE WORK-PRODUCT DOCTRINE 764-767 (5th ed. 2007). Pantech even recognizes that “the attorney-client privilege may apply to certain communications with foreign legal professionals.” Pantech Mot. to Compel, p. 10.

Thus, Philips submits that after the parties have narrowed the scope of the dispute the parties should brief the Court on the privilege applicable to patent agents and attorneys of any remaining jurisdictions still at issue. At this stage, however, Philips believes it is premature for

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the Court to address Pantech's sweeping complaints until the parties have narrowed the scope of their disputes on this issue.

Issue 7 – Philips Privilege Log Sufficiently Identifies the Basis for Privilege for Each Document Listed

Pantech asserts that Philips' privilege log is deficient because Philips does not identify which of the individuals on the privilege log work(ed) for Philips and therefore does not provide a sufficient basis to establish privilege upon which to withhold the documents. Pantech's argument is without basis. As Pantech admits, Philips' privilege log identifies each attorney on the log with an "*." In addition, the privilege log identifies the basis upon which each documents has been withheld, be it the attorney-client privilege, the attorney work-product doctrine, and/or a Joint Defense Agreement. This information is sufficient to establish the basis for withholding the documents.

As discussed above, Philips' privilege log is comprehensive, including more than 25,000 entries. For Philips to confirm the exact title and position of each individual listed on the log for each year the individual worked for Philips would be overly burdensome and would take Philips months to accomplish. In an effort to resolve this dispute, Philips has offered to provide information about specific individuals Pantech is concerned about. As discussed above, Pantech has identified a number of attorneys identified on the privilege log for which it has requested more information, and Philips is working to provide the information requested.

Because Philips' privilege log sufficiently establishes the privilege basis upon which its documents have been redacted or withheld, Pantech's Motion to Compel on this issue should be denied.

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Issue 8 – Joint Defense Agreements

Philips has withheld a number of documents as privileged based on two Joint Defense Agreements: one with MPEG LA, an organization through which Philips' licenses the patent-in-suit, and one with Sony Corporation. Philips is working to obtain copies of these Joint Defense Agreements and will provide them to Pantech as soon as possible. Even without producing the Joint Defense Agreements themselves, some of the documents Philips is withholding indicate on their face that these documents are subject to joint defense agreements.

Respectfully yours,

/s/

Brian A. Rosenthal

cc: Hon. Theodore H. Katz
Alan M. Grimaldi
Charles Updike



1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com
Direct Dial 202.383.7436

November 28, 2007

VIA FEDERAL EXPRESS

Peter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Peter,

I have enclosed Philips' privilege logs for the above-referenced matters. We are in the process of finalizing our document production and plan to supplement these privilege logs in mid-December.

The LG Privilege Log, which is in the first box, is produced pursuant to the Joint Protective Order, entered June 11, 2007. And the Pantech Privilege Log, which is in the second box, is produced pursuant to the Joint Protective Order, entered June 20, 2007.

Sincerely,


Ann Marie Phillips

Enclosures

cc: Alan M. Grimaldi (*without enclosures*)
Brian A. Rosenthal (*without enclosures*)

AMSTERDAM BRUSSELS CHICAGO EAST PALO ALTO HOUSTON IRVINE LONDON LOS ANGELES
MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC



1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com

Direct Dial 202.383.7436

December 6, 2007

VIA FEDERAL EXPRESS

Peter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Peter,

I have enclosed Philips' supplemental privilege logs for the above-referenced matters. I have also enclosed documents bearing Bates Nos. PH_LG 0285338 to PH_LG 0289492 (the "LG Production") and PH_PAN 0285338 to PH_PAN 0289492 (the "Pantech Production") for production in the above-referenced matters.

The LG privilege log and LG Production, both of which are in the first box, are produced pursuant to the Joint Protective Order, entered June 11, 2007. The Pantech privilege log and Pantech Production, which are in the second box, are produced pursuant to the Joint Protective Order, entered June 20, 2007.

Sincerely,

A handwritten signature in cursive script that reads "Ann Marie Phillips".

Ann Marie Phillips

Enclosures

cc: Alan M. Grimaldi (*without enclosures*)
Cecil E. Key (*without enclosures*)
Brian A. Rosenthal (*without enclosures*)

AMSTERDAM BRUSSELS CHICAGO EAST PALO ALTO HOUSTON IRVINE LONDON LOS ANGELES
MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC

HOWREY_{LLP}

1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com

Direct Dial 202.383.7436

February 29, 2008

VIA FEDEX

Peter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Peter,

I have enclosed Philips' supplemental privilege logs for the above-referenced matters. The LG privilege log is produced pursuant to the Joint Protective Order, entered June 11, 2007. The Pantech privilege log is produced pursuant to the Joint Protective Order, entered June 20, 2007. Each privilege log supersedes any and all privilege logs previously produced.

Sincerely,



Ann Marie Phillips

Enclosures

cc: Alan M. Grimaldi (*without enclosures*)
Cecil E. Key (*without enclosures*)
Brian A. Rosenthal (*without enclosures*)

AMSTERDAM BRUSSELS CHICAGO EAST PALO ALTO HOUSTON IRVINE LONDON LOS ANGELES
MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC

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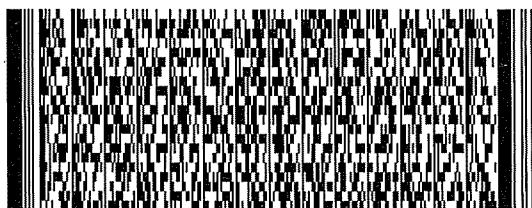
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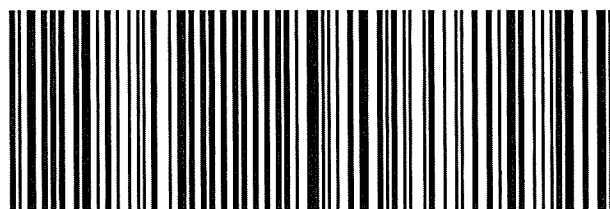
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KEY:
* - DENOTES ATTORNEY
AC - ATTORNEY CLIENT PRIVILEGE
JD - JOINT DEFENSE PRIVILEGE
WP - WORK PRODUCT PRIVILEGE

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4419	03/25/87	DE HAAN, F.J.*	PHILIPS PATENTVERWALTUNG GmbH*		LETTER REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING PROSECUTION (USA, CHINA, JAPAN, KOREA, TAIWAN, AUSTRIA, FRANCE, GERMANY, ITALY, SWEDEN, NETHERLANDS, UK)	AC
4420	07/25/86	CENTRAL INTERNATIONAL LAW FIRM*, LEE, BYONG HO*, MOON, K.J.*	VOLMER, GEORG*		LETTER CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (KOREA)	AC
4421	07/10/86	CENTRAL INTERNATIONAL LAW FIRM*, LEE, BYONG HO*, MOON, K.J.*	VOLMER, GEORG*		FACSIMILE REFLECTING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (JAPAN)	AC
4422	07/10/86	SONDERHOFF & EINSEL*	INTERNATIONAAL OCTROOIBUREAU B.V.		LETTER REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING PROSECUTION (KOREA)	AC
4423	02/28/86	CENTRAL INTERNATIONAL LAW FIRM*, LEE, BYONG HO*, MOON, K.J.*	VOLMER, GEORG*		LETTER REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING PROSECUTION (KOREA)	AC
4424	02/27/86	CENTRAL INTERNATIONAL LAW FIRM*, LEE, BYONG HO*, MOON, K.J.*	VOLMER, GEORG*		LETTER REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING PROSECUTION (KOREA)	AC

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7164	05/19/05	PIOTROWSKI, TONY E.*	SCOTT, KEVIN*	TANGENA, ANTHONY G. (TONY)*; MERTENS, MARK J.W.*; SCHOENMAKER, MAARTEN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7165	05/19/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*	SLOBOD, JACK D.*; OWEN, DAVID P.*; GRIMALDI, ALAN M.*	EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7166	05/20/05	SCOTT, KEVIN*	VOGEL, PETER	VOLMER, GEORG*; SLOBOD, JACK D.*	INFORMATION FOR THE PURPOSE OF RENDERING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7167	05/22/05	VAN DEN BROEK, BART J.*	SLOBOD, JACK D.*; SCOTT, KEVIN*	GRIMALDI, ALAN M.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7168	05/23/05	TSUGARU, SUSUMU*	SCOTT, KEVIN*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7169	05/23/05	OWEN, DAVID P.*	SCOTT, KEVIN*	SLOBOD, JACK D.*; VAN DEN BROEK, BART J.*; GRIMALDI, ALAN M.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7170	05/23/05	SCOTT, KEVIN*	OWEN, DAVID P.*	GRIMALDI, ALAN M.*; SLOBOD, JACK D.*; VAN DEN BROEK, BART J.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7171	05/23/05	SCOTT, KEVIN*	VAN DER MEER, JAN*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7172	05/24/05	VAN DER MEER, JAN*	SCOTT, KEVIN*	SLOBOD, JACK D.*; VAN DER MEER, JAN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7173	05/24/05	SCOTT, KEVIN*	OWEN, DAVID P.*	GRIMALDI, ALAN M.*; SLOBOD, JACK D.*; VAN DEN BROEK, BART J.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7174	05/25/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; OWEN, DAVID P.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP

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7176	05/31/05	SCOTT, KEVIN*	VOLMER, GEORG*	SLOBOD, JACK D.*	INFORMATION FOR THE PURPOSE OF RENDERING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7177	05/31/05	VOLMER, GEORG*	SCOTT, KEVIN*	SLOBOD, JACK D.*; SCHMELZER, MEILING	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7178	05/31/05	SLOBOD, JACK D.*	VOLMER, GEORG*	SCOTT, KEVIN*; SCHMELZER, MEILING	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7179	05/31/05	VOLMER, GEORG*	SLOBOD, JACK D.*	SCOTT, KEVIN*; SCHMELZER, MEILING	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7180	06/01/05	SCOTT, KEVIN*	VOLMER, GEORG*	SLOBOD, JACK D.*; SCHMELZER, MEILING	EMAIL PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7181	06/01/05	MERTENS, MARK J.W.*	SLOBOD, JACK D.*	SCOTT, KEVIN*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7182	06/02/05	SCOTT, KEVIN*	MORRIS, OOTAVIUS JOHN (O.J.)		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7183	06/02/05	MERTENS, MARK J.W.*	SLOBOD, JACK D.*; SCOTT, KEVIN*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7184	06/02/05	MORRIS, OOTAVIUS JOHN (O.J.)	SCOTT, KEVIN*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
7185	06/03/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; OWEN, DAVID P.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP

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7198	06/05/05	SLOBOD, JACK D.*	VOLMER, GEORG*; SCHMELZER, MEILING	SCOTT, KEVIN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7199	06/05/05	SLOBOD, JACK D.*	TSUGARU, SUSUMU*	SCOTT, KEVIN*; TSUGARU, SUSUMU*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7200	06/06/06	VAN DEN BROEK, BART J.*	SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; SCOTT, KEVIN*; OWEN, DAVID P.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7201	06/06/05	SLOBOD, JACK D.*	VAN DEN BROEK, BART J.*	GRIMALDI, ALAN M.*; SCOTT, KEVIN*; OWEN, DAVID P.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7202	06/06/05	SLOBOD, JACK D.*	VOGEL, PETER	VOLMER, GEORG*; SCOTT, KEVIN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7203	06/06/05	SCOTT, KEVIN*	VAN DEN BROEK, BART J.*	GRIMALDI, ALAN M.*; SLOBOD, JACK D.*; OWEN, DAVID P.*; VAN DEN BROEK, BART J.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7204	06/07/05	HANE, NAOKO*	SLOBOD, JACK D.*	SCOTT, KEVIN*; TSUGARU, SUSUMU*	EMAIL WITH ATTACHMENTS PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7205	06/07/05	VAN DER MEER, JAN*	SCOTT, KEVIN*	SLOBOD, JACK D.*	EMAIL PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
7206	06/07/05	SCOTT, KEVIN*	SLOBOD, JACK D.*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7207	06/07/05	SCOTT, KEVIN*	SLOBOD, JACK D.*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
7208	06/07/05	SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; OWEN, DAVID P.*; VAN DEN BROEK, BART J.*; ANZALONE, STEVEN*; DECOSTA, FRANK A.*	SCOTT, KEVIN*	EMAIL WITH ATTACHMENTS PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP

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7359	06/09/06	YANG, CHUN Y. *	CHO, KENNETH *	SLOBOD, JACK D. *; SCOTT, KEVIN *; CHO, SUNG-KWON *; OH, KWAN-SEOK *; JUNG, EUN-JIN *	EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7360	08/24/05	VOLMER, GEORG *	SLOBOD, JACK D. *	SCOTT, KEVIN *	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7361	08/24/05	SLOBOD, JACK D. *	VOLMER, GEORG *	SCOTT, KEVIN *	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7362	09/14/05	SCOTT, KEVIN *	VOGEL, PETER	SLOBOD, JACK D. *; VOLMER, GEORG *	ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
7363	10/17/05	OWEN, DAVID P. *	SCOTT, KEVIN *; SLOBOD, JACK D. *	GRIMALDI, ALAN M. *; KEE, NELSON M. *	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7364	10/17/05	SLOBOD, JACK D. *	DECOSTA, FRANK A. *	ANZALONE, STEVEN *; SCOTT, KEVIN *; CHO, KENNETH *	EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7365	10/24/05	DECOSTA, FRANK A. *	SLOBOD, JACK D. *	SCOTT, KEVIN *	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7366	10/24/05	SLOBOD, JACK D. *	DECOSTA, FRANK A. *	SCOTT, KEVIN *	EMAIL REFLECTING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
7367	10/24/05	SLOBOD, JACK D. *	OWEN, DAVID P. *	GRIMALDI, ALAN M. *; KEE, NELSON M. *; SCOTT, KEVIN *	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7368	10/24/05	OWEN, DAVID P. *	SLOBOD, JACK D. *	GRIMALDI, ALAN M. *; KEE, NELSON M. *; SCOTT, KEVIN *	EMAIL REFLECTING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
7369	11/20/05	VAN DEN BROEK, BART J. *	VOGEL, PETER	VOLMER, GEORG *; CHO, KENNETH *; SCOTT, KEVIN *; DECOSTA, FRANK A. *	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7370	11/20/05	VAN DEN BROEK, BART J. *	VOGEL, PETER	VOLMER, GEORG *; CHO, KENNETH *; SCOTT, KEVIN *; DECOSTA, FRANK A. *	EMAIL WITH ATTACHMENTS REFLECTING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
7371	11/21/05	VAN DEN BROEK, BART J. *	VOGEL, PETER	VOLMER, GEORG *; CHO, KENNETH *; SCOTT, KEVIN *; DECOSTA, FRANK A. *	EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP

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12767	08/25/05	SLOBOD, JACK D.*	DECOSTA, FRANK A.*; GRIMALDI, ALAN M.*; ANZALONE, STEVEN*; VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; TSUGARU, SUSUMU*; BUTTRICK, RICHARD*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12768	12/13/05	SCOTT, KEVIN*	VAN DEN BROEK, BART J.*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12769	12/13/05	OWEN, DAVID P.*	SCOTT, KEVIN*; SLOBOD, JACK D.*	VAN DEN BROEK, BART J.*; GRIMALDI, ALAN M.*; KEE, NELSON M.*; DECOSTA, FRANK A.*; OWEN, DAVID P.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12770	09/14/05	DECOSTA, FRANK A.*	OWEN, DAVID P.*; SLOBOD, JACK D.*; SCOTT, KEVIN*	GRIMALDI, ALAN M.*; KEE, NELSON M.*; VAN DEN BROEK, BART J.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12771	09/14/05	SCOTT, KEVIN*	VOGEL, PETER	SLOBOD, JACK D.*; VOLMER, GEORG*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12772	09/15/05	SCOTT, KEVIN*	VAN DEN BROEK, BART J.*	SLOBOD, JACK D.*; VOLMER, GEORG*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12773	09/16/05	VOLMER, GEORG*	SLOBOD, JACK D.*; SCOTT, KEVIN*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12774	09/16/05	SCOTT, KEVIN*	VOLMER, GEORG*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12775	09/16/05	SCOTT, KEVIN*	VOLMER, GEORG*	SLOBOD, JACK D.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12776	09/22/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; SLOBOD, JACK D.*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
12777	10/04/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; OWEN, DAVID P.*	DECOSTA, FRANK A.*; GRIMALDI, ALAN M.*; ESFAHANI, HOUDAN*; SLOBOD, JACK D.*; KEE, NELSON M.*; ANZALONE, STEVEN*; VAN DEN BROEK, BART J.*; VOLMER, GEORG*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP

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12804	11/20/05	VAN DEN BROEK, BART J.*	VOGEL, PETER	VOLMER, GEORG*.; CHO, KENNETH*.; SCOTT, KEVIN*.; DECOSTA, FRANK A.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/MP
12805	11/20/05	VAN DEN BROEK, BART J.*	VOGEL, PETER	VOLMER, GEORG*.; CHO, KENNETH*.; SCOTT, KEVIN*.; DECOSTA, FRANK A.*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/MP
12806	11/21/05	VAN DEN BROEK, BART J.*	VOGEL, PETER	VOLMER, GEORG*.; CHO, KENNETH*.; SCOTT, KEVIN*.; DECOSTA, FRANK A.*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/MP
12807	11/29/05	VAN DEN BROEK, BART J.*	DECOSTA, FRANK A.*; CHO, KENNETH*.; SCOTT, KEVIN*	OWEN, DAVID P.*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/MP
12808	01/20/06	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*.; CHO, KENNETH*.; SLOBOD, JACK D.*.; DECOSTA, FRANK A.*	OWEN, DAVID P.*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/MP
12809	01/15/03	SCOTT, KEVIN*	BUTTRICK, RICHARD*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING LICENSING	AC
12810	01/15/03	BUTTRICK, RICHARD*	SCOTT, KEVIN*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
12811	03/04/03	SCOTT, KEVIN*	BUTTRICK, RICHARD*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
12812	04/10/03	SCOTT, KEVIN*	BUTTRICK, RICHARD*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
12813	04/25/03	SCOTT, KEVIN*	BUTTRICK, RICHARD*.; BECKERS, HUUB F.M.*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING LICENSING	AC
12814	06/12/03	WHITE, ANDREW	SHARROCK, DAN*.; MURLEY, DARREN; MARDEN, DAVID; MELBOURNE, DAVID; SCOTT, KEVIN*.; HILLIER, PAUL.; WILLIAMSON, PAUL*.; MABEY, PETER; TURNER, RICHARD; ZULSTRA, ROB; TOWNSEND, STEVE*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
12815	07/14/03	SCOTT, KEVIN*	BUTTRICK, RICHARD*.; BECKERS, HUUB F.M.*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC

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13484	05/16/05	KARET, IAN*	SLOBOD, JACK D.*	SCOTT, KEVIN*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
13485	05/17/05	VAN HOOFT, AD	SCOTT, KEVIN*		EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	AC
13486	05/17/05	SCOTT, KEVIN*	BUTTRICK, RICHARD*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	AC
13487	05/18/05	SCOTT, KEVIN*	VAN DEN BROEK, BART J.*	OWEN, DAVID P.; SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
13488	05/18/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*	OWEN, DAVID P.; SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	AC
13489	05/18/05	SCOTT, KEVIN*	PIOTROWSKI, TONY E.*	TANGAENA, ANTHONY G. (TONY)*; SCHOENMAKER, MARTEN*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
13490	05/18/05	SCOTT, KEVIN*	VAN DEN BROEK, BART J.*	OWEN, DAVID P.; SLOBOD, JACK D.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
13491	05/18/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*	OWEN, DAVID P.; SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	AC
13492	05/20/05	SCOTT, KEVIN*	VOGEL, PETER	VOLMER, GEORG*; SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
13493	05/22/05	VAN DEN BROEK, BART J.*	SLOBOD, JACK D.*; SCOTT, KEVIN*	GRIMALDI, ALAN M.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
13494	05/23/05	TSUGARU, SUSUMU*	SCOTT, KEVIN*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
13495	05/23/05	OWEN, DAVID P.*	SCOTT, KEVIN*	SLOBOD, JACK D.*; VAN DEN BROEK, BART J.*; GRIMALDI, ALAN M.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP
13496	05/23/05	SCOTT, KEVIN*	VAN DER MEER, JAN*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC/WP

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13497	05/24/05	SCOTT, KEVIN*	OWEN, DAVID P.*	GRIMALDI, ALAN M.*; SLOBOD, JACK D.*; VAN DEN BROEK, BART J.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13498	05/29/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; OWEN, DAVID P.*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13499	05/31/05	SCOTT, KEVIN*	VOGEL, PETER	SLOBOD, JACK D.*; VOLMER, GEORG*	REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13500	05/31/05	SCOTT, KEVIN*	VOLMER, GEORG*	SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13501	06/01/05	MERTENS, MARK J.W.*	SLOBOD, JACK D.*	SCOTT, KEVIN*	EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13502	06/02/05	SCOTT, KEVIN*	MORRIS, OOTAVIUS JOHN (O.J.)		EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13503	06/02/05	MERTENS, MARK J.W.*	SLOBOD, JACK D.*; SCOTT, KEVIN*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT	AC
13504	06/03/05	VAN DEN BROEK, BART J.*	SCOTT, KEVIN*; SLOBOD, JACK D.*	GRIMALDI, ALAN M.*; OWEN, DAVID P.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	ACMP
13505	06/03/05	SCOTT, KEVIN*	MORRIS, OOTAVIUS JOHN (O.J.)		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
13506	06/03/05	ANZALONE, STEVEN*	SLOBOD, JACK D.*; SCOTT, KEVIN*	DECOSTA, FRANK A.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING INFRINGEMENT	ACMP
13507	06/03/05	ANZALONE, STEVEN*	SLOBOD, JACK D.*	DECOSTA, FRANK A.*; SCOTT, KEVIN*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	AC
13508	06/03/05	SLOBOD, JACK D.*	DECOSTA, FRANK A.*	ANZALONE, STEVEN*; SCOTT, KEVIN*	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP
13509	06/03/05	SLOBOD, JACK D.*	ANZALONE, STEVEN*; DECOSTA, FRANK A.*	SCOTT, KEVIN*; FOX, MARIANNE	EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACMP

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21640	04/26/05	DE VISSER, JAN C.*	SLOBOD, JACK D.*		EMAIL WITH ATTACHMENTS PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING LICENSING	AC
21641	03/05/05	DE VISSER, JAN C.*			NOTES WITH ATTACHMENTS REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21642	08/27/04	CHIA-HSING, LIN*	DE VISSER, JAN C.*	FONG, EDDIE*	EMAIL WITH ATTACHMENTS REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING LICENSING	AC
21643	03/09/05	DE VISSER, JAN C.*	HANE, NAOKO*	LI, JAMES*; CHIA-HSING, LIN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS TO COUNSEL REGARDING LICENSING	AC
21644	09/23/05	CHIA-HSING, LIN*	DE VISSER, JAN C.*	SLOBOD, JACK D.*; MIYAZAKI, AKHIKO*; LI, JAMES*	EMAIL WITH ATTACHMENTS PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING LICENSING	AC
21645	05/05/05	DE VISSER, JAN C.*			NOTES WITH ATTACHMENTS REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21646	12/19/05	DE VISSER, JAN C.*	TSUGARU, SUSUMU*		EMAIL WITH ATTACHMENTS SEEKING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21647	05/16/02	KOOIMAN, J.J.A. (TON)*			PRESANTATION REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21648	11/17/99	KOOIMAN, J.J.A. (TON)*			DRAFT AGREEMENT REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21649	11/23/99	KOOIMAN, J.J.A. (TON)*			DRAFT AGREEMENT REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21650	05/31/05	SCOTT, KEVIN*	VOGEL, PETER	SLOBOD, JACK D.*; VOLMER, GEORG*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
21651	08/25/05	SLOBOD, JACK D.*	VOGEL, PETER	VOLMER, GEORG*; SCOTT, KEVIN*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
21652	05/20/05	SCOTT, KEVIN*	VOGEL, PETER	VOLMER, GEORG*; SLOBOD, JACK D.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS REGARDING INFRINGEMENT IN ANTICIPATION OF LITIGATION	ACWP
21653	01/12/93	KOOIMAN, J.J.A. (TON)*	VOGEL, PETER; NEUMANN, LOTHAR*; MORRIS, O.J. (JOHN); ANDREWS, ARTHUR; LANDOUSY, CHRISTIAN*; MARION, MICHAEL E.*; KEESMAN, GERTJAN; VAN DER MEER, JAN*; SCHMITZ, HERMAN JR.*	BECKERS, HUBB F.M.*	FACSIMILE CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PATENT PORTFOLIO	AC

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21664	01/12/93	KOOIMAN, J.J.A. (TON)*	VOGEL, PETER; NEUMANN, LOTHAR*; MORRIS, O.J. (JOHN); ANDREWS, ARTHUR; LANDOUSY, CHRISTIAN*; MARION, MICHAEL E.*; KEESMAN, GERT JAN; VAN DER MEER, JAN*; SCHMITZ, HERMAN J.R.*	BECKERS, HUB F.M.*	FACSIMILE CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PATENT PORTFOLIO	AC
21665	05/15/92	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21666	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21667	03/08/93	VOLMER, GEORG*	VOGEL, PETER		MEMORANDUM CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (EU)	AC
21668	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21669	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21680	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21661	08/10/90	DEMMEER, W.	SPEIDEL, JOACHIM	VOGEL, PETER	MEMORANDUM STATING INTENTION TO SEEK LEGAL ADVICE OF COUNSEL (TAMOSHUNAS, AL*) REGARDING PATENTABILITY	AC
21662	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21663	01/31/89	BRIODY, THOMAS A.*	KOOIMAN, J.J.A. (TON)*	VOGEL, PETER	LETTER CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (USA)	AC
21664	12/20/89	KOOIMAN, J.J.A. (TON)*	NEUMANN, LOTHAR*		LETTER CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (USA)	AC
21665	09/25/90	LOBATO, EMMANUEL J.*	NEUMANN, LOTHAR*	VOGEL, PETER	FACSIMILE CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (USA)	AC
21666	05/15/92	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21667	02/00/98	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC

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21668	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21669	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21670	06/10/05	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21671	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21672	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21673	06/10/05	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21674	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21675	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21676	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21677	03/01/98	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21678	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21679	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21680	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC

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21681	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21682	06/01/87	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21683	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21684	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21685	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21686	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21687	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21688	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21689	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21690	01/13/93	VOGEL, PETER	NEUMANN, LOTHAR*		NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21691	01/18/93	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21692	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC
21693	00/00/00	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT) FOR RENDERING OF LEGAL ADVICE	AC

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21694	08/27/91	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21695	08/00/87	VOGEL, PETER			NOTES PREPARED AT THE REQUEST OF COUNSEL (PHILIPS LEGAL DEPARTMENT*) FOR RENDERING OF LEGAL ADVICE	AC
21696	08/12/92	SPEIDEL, JOACHIM; VOGEL, PETER	KOOIMAN, J.J.A. (TONY)*	LOSER, MR.; PEUCKERT, HERMANN*; SELMANN, MR.; THIELMANN, H.; WALZ, MR.; WEIDNER, DR.	LETTER PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE	AC
21697	06/27/03	CENTRAL INTERNATIONAL LAW FIRM*	VAN DER KRUIK, WIM L.*		EMAIL REFLECTING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (KOREA)	AC
21698	05/30/03	VAN DER KRUIK, WIM L.*	TOWNSEND, STEVE*		EMAIL WITH ATTACHMENTS CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (UK)	AC
21699	04/24/03	SHANNON, CARREEN*	BECKERS, HUUB F.M.*; VAN DER KRUIK, WIM L.*	HOYNG, WILLEM*	MEMORANDUM CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (GERMANY); PROSECUTION (UK); PROSECUTION (FRANCE); PROSECUTION (SPAIN)	AC
21700	02/26/04	VOS, GERARD J.J.*	VAN DER KRUIK, WIM L.*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING MARKET ANALYSIS	AC
21701	08/21/03	VAN DER KRUIK, WIM L.*	VAN GESTEL, WIM J.*		MEMORANDUM CONTAINING LEGAL ADVICE OF COUNSEL REGARDING STANDARDS	AC
21702	08/16/03	VAN DER KRUIK, WIM L.*	CENTRAL INTERNATIONAL LAW FIRM*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (KOREA)	AC
21703	06/29/01	VAN DER KRUIK, WIM L.*			REPORT REFLECTING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21704	02/15/02	VAN DER KRUIK, WIM L.*	MIYAZAKI, AKIHIKO*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING PROSECUTION (JAPAN)	AC
21705	01/10/02	BECKERS, HUUB F.M.*	KOOIMAN, J.J.A. (TONY)*	VAN DER KRUIK, WIM L.*	EMAIL REFLECTING CONFIDENTIAL ATTORNEY CLIENT COMMUNICATIONS FROM COUNSEL REGARDING LICENSING	AC
21706	11/22/01	BECKERS, HUUB F.M.*	VAN DER KRUIK, WIM L.*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21707	10/02/01	BECKERS, HUUB F.M.*	VAN DER KRUIK, WIM L.*		EMAIL CONTAINING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC
21708	07/03/02	VAN DER KRUIK, WIM L.*	BECKERS, HUUB F.M.*		EMAIL WITH ATTACHMENTS PROVIDING CONFIDENTIAL INFORMATION TO COUNSEL FOR THE PURPOSE OF RENDERING LEGAL ADVICE REGARDING LICENSING	AC
21709	06/29/01	VAN DER KRUIK, WIM L.*	BECKERS, HUUB F.M.*	HENDRIKS, LILIANE E.B.	EMAIL WITH ATTACHMENTS SEEKING LEGAL ADVICE OF COUNSEL REGARDING LICENSING	AC

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1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com

Direct Dial 202.383.7318

March 7, 2008

VIA FEDEX AND E-MAIL

Peter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Peter,

Upon further review of the documents referenced in Section I.B. of Pantech's Motion to Compel filed February 29, 2008, I enclose documents bearing Bates Nos. PH_LG 0289855 to PH_LG 0290608 ("LG Production") and PH_PAN 0290084 to PH_PAN 0290608 ("Pantech Production") for production in the above-referenced matters. Please note that documents PH_LG 0289855 to PH_LG 0290083 are produced as placeholders to maintain the same numbering system between the LG Production and PAN Production.

The documents produced were located in a section of one of Peter Vogel's notebooks. They were originally withheld on the basis of attorney client privilege and work product. We understood that the notes contained on these documents were made by Dr. Vogel at the request of counsel and/or in anticipation of litigation. Upon further investigation, that may not have been the case. The documents we produce today correspond to the following entries on our most recent privilege logs, dated February 29, 2008: ref. nos. 21874, 21878, 21881, 21885, 21889 to 21908, and 21910 to 21914. We have reviewed the remaining documents referenced in Section I.B. of Pantech's Motion to Compel and confirm that they were properly withheld.

The LG Production is produced pursuant to the Joint Protective Order, entered June 11, 2007. The Pantech Production is produced pursuant to the Joint Protective Order, entered June 20, 2007.

AMSTERDAM BRUSSELS CHICAGO EAST PALO ALTO HOUSTON IRVINE LONDON LOS ANGELES
MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC

Peter J. Kirk, Esq.
March 7, 2008
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Sincerely,

Ann Marie Phillips, Esq.
Ann Marie Phillips

cc: Alan M. Grimaldi (*without enclosures*)
Cecil E. Key (*without enclosures*)
Brian A. Rosenthal (*without enclosures*)

HOWREY^{LLP}

1299 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, DC 20004-2402
PHONE: 202.783.0800 • FAX: 202.383.6610

FACSIMILE COVER SHEET

Date: 2008-02-20 00:10:37 GMT

To:

Name: Ann Marie Phillips

Company: Howrey, LLP

Fax #: 12023188643

From: *Name:* Ann Marie Phillips

Fax #: 12023188643

Subject: Philips v. LGE/Pantech

MESSAGE:

Please see attached correspondence.

THE INFORMATION CONTAINED IN THIS TRANSMISSION IS PRIVILEGED AND CONFIDENTIAL. IT IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US IMMEDIATELY BY TELEPHONE AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

IF THERE ARE ANY QUESTIONS OR PROBLEMS WITH THE TRANSMISSION OF THIS FACSIMILE, PLEASE CONTACT THE SENDER.

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Direct Dial 202.383.7436

February 19, 2008

VIA FACSIMILE AND U.S. MAILPeter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110**Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.***
Civil Case No.: 06-1402***U.S. Philips Corporation v. Pantech Wireless, Inc., et al.***
Civil Case No.: 06-4583

Dear Peter,

We are in receipt of your letter, dated February 15, 2008 regarding whether various documents produced by Philips in the above-referenced litigations contain redactions.

First, Philips again confirms that it redacted documents containing privileged material solely by placing a white box with an "X" through it over the privileged material. All redacted documents contain the same white box with an "X" through it.

Second, with respect to the three exemplary documents identified in your letter, Philips confirms that there are no further redactions in documents PH_LG 056522-729,¹ PH_LG 0172824-3267, or PH_LG 0094737-920, as evidenced by the lack of white boxes containing "X's."

Sincerely,



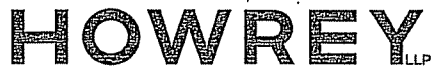
Ann Marie Phillips

¹ As noted in your letter, Philips has already produced unredacted copies of PH_LG 056521 and PH_LG 056522.

HOWREY_{LLP}

Peter J. Kirk, Esq.
February 19, 2008
Page 2

cc: Alan M. Grimaldi
Cecil E. Key
Brian A. Rosenthal



1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com

Direct Dial 202.383.7436

March 18, 2008

VIA FACSIMILE AND U.S. MAIL

Matthew J. Leary, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Matthew,

I have received your letter of March 11, 2008, regarding the parties' discussion of U.S. Philips Corporation's supplemental privilege logs, produced in the above-referenced matters on February 29, 2008 ("Supplemental Privilege Logs"). Below is our response to your specific inquiries.

Jan Van Der Meer Documents:

Documents originally withheld solely on the basis that Jan van der Meer was identified as an attorney, were produced last week to Peter Kirk. A list of those documents and the corresponding privilege log Entry numbers can be found in my letter to Mr. Kirk, dated March 15, 2008. Philips will revise its Supplemental Privilege Logs to reflect this production.

Kevin Scott Documents:

We are in the process of reviewing documents on Philips' Supplemental Privilege Logs for which Kevin Scott is the only individual identified as an attorney who authored or received the document prior to 2000, when Mr. Scott obtained his UK Patent Attorney qualifications. See Scott Dep. pp. 63-64.

First, we do not agree with the implication in your letter that we agreed with your characterization that we are not able to assert privilege for communications with Mr. Scott prior to 2000. We did not agree to this characterization, and instead told you that we would look into the issue.

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MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC

HOWREY

Peter J. Kirk, Esq.
 March 18, 2008
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Second, after reviewing the privilege log, we have identify seven entries that fall under this category of documents, including Entry Nos. 6330, 14727, 14728, 14760, 14849, 15010, and 22560. With respect to Entry Nos. 14727, 14728, 14760, and 15010, we have been able to identify dates for those documents and will update Philips' Supplemental Privilege Logs to reflect the following dates:

Entry No.	Date
14727	12/21/05
14728	12/21/05
14760	3/24/05
15010	4/14/05

With respect to Entry Nos. 6330, 14849, and 22560, we will continue to investigate these documents and update you as soon as we have more information. Mr. Scott did testify that he began working in IP&S in the U.K. in 1997. *See id.* pp. 60-61. As such much, if not all, of Mr. Scott's work between 1997 and 2000 was done under the supervision and/or at the direction of attorneys in IP&S.

"White-on-White" Redactions:

In your March 11 letter, you identified two documents that you believed contained so-called "white-on-white" redactions, including PH_PAN 0009230 and PH_PAN 072746-47.

First, PH_PAN 0009230 (produced to LG Electronics, Inc. at PH_LG 009243, Entry No. 1335) does not contain any redactions. This document was erroneously identified on our privilege log as containing redactions, when in fact there are no redactions on this document. In addition to this document, we have reviewed all of our redacted documents and discovered that two other documents were also erroneously identified as containing redactions when they do not, including: (1) PH_LG 0288730-731, PH_PAN 0288730-731 Entry No. 885; and (2) PH_LG 0067665-670, PH_PAN 0067422-427, Entry No. 5151. Philips will revise its Supplemental Privilege Logs to reflect this information.

Second, document PH_PAN 72746-47 (produced to LG Electronics, Inc. at PH_LG 009384-85, Entry No. 1345) contains a large box with a large "X" through it, which, as Philips has previously explained on numerous occasions, indicates that this documents has been redacted. Moreover, this documents contains clear typewritten words reading, "INTENTIONALLY LEFT BLANK." As such, Philips does not understand Pantech's complaint that this document contains "white-on-white" redactions.

As I have stated in numerous letters and during numerous telephone conferences, Philips has always indicated every redaction it has made with a box with an "X" through it. Philips has never used so-called "white-on-white" redactions on any of its redacted documents.



Peter J. Kirk, Esq.
March 18, 2008
Page 3

Identification of Authors, Addressees, And Copyees:

In your letter, you identified PH_PAN 0030341 as a document where the log appeared to identify the authors, addressees, and/or copyees based on the underlying document, rather than providing the authors, addressees, and/or copyees of the privileged handwritten notes. The notes that were redacted from this document were Jan van der Meer's notes. Mr. Van der Meer was identified in the author field of Philips' Supplemental Privilege Log, Entry No. 1699. Per my letter to Mr. Kirk dated March 15, 2008, an unredacted copy of this document has been produced by Philips. It has been Philips' practice to identify on its privilege log the author of the handwritten notes, when it is the handwritten notes that have been redacted for privilege. If there are other examples you would like us to investigate, please identify them for us.

Vogel Documents:

Pursuant to my letter to Mr. Kirk, dated March 7, 2008, Philips has reviewed those documents authored by Peter Vogel that were withheld on the basis of privilege. As stated in my March 7 letter, Philips produced those documents it determined were not privileged and concluded that the remaining documents on Philips' Supplemental Privilege Log are privileged.

For the bases of Philips' claims of privilege, please review the entire entry for each document withheld, including the description of the document. Please note that in many cases the descriptions of the documents include the identity of the person(s) or category of persons at whose direction the document was created (*see, e.g.*, Entry Nos. 21875, 21877, 21879). If there are any particular examples that you wish for us to examine again, please identify them for us.

Documents for Which "Philips Intellectual Property Department" was listed as the author or recipient:

In your letter, you identified two entries on Philips' Supplemental Privilege Log as listing "Philips Intellectual Property Department" as the author or recipient of the document: Entry Nos. 14984 and 19995. You further characterize these entries as not identifying either an author or recipient. We disagree with your characterization. On their face, these documents were authored by or received by the Philips Intellectual Property Department as a whole, which includes lawyers.

As we discussed during our telephone conference on March 10, 2008, Philips will review documents for which "Philips Intellectual Property Department" is identified as the author or recipient in an effort to provide you with more information about the document if such information is available.

HOWREY_{LLP}

Peter J. Kirk, Esq.
March 18, 2008
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Documents Reflecting "Intentions" About Seeking Legal Advice:

Philips has only been able to identify two entries on its privilege logs that describe the documents as "stating intention to seek legal advice...." The first document, Entry No. 1930, was identified by you in your February 20, 2008 letter. As Philips clarified in its February 28, 2008 response, that entry contained a typographical error that was corrected in Philips' Supplemental Privilege Logs. The only entry on Philips' Supplemental Privilege Logs that described a document as "stating intention to seek legal advice..." is Entry No. 21880. The description for this document also contains a typographical error that will be corrected in its revised Supplemental Privilege Logs.

Documents Used by Dr. John Morris to Prepare for his January 10, 2008 Deposition:

Alan Grimaldi objected on the record to this request by Pantech, as Pantech failed to establish on the record that the documents Dr. Morris reviewed in preparation for the deposition actually refreshed his recollection as to the subject matters covered by the deposition. *See* Morris Dep. p. 19. Upon review of the transcript, Pantech failed to establish such a foundation at any time during Dr. Morris' deposition. Moreover, Pantech did not establish which of the documents Dr. Morris reviewed before his deposition actually refreshed his recollection as to any matters, nor did Pantech establish for which matters the documents reviewed refreshed his recollection. As such, Philips is under no obligation to produce any documents to Pantech. I will note, however, that many of the documents discussed by Dr. Morris have already been produced to Pantech in this case.

Identification of Attorneys:

We are currently analyzing our privilege log in an attempt to identify with specificity further information about the attorneys listed under entries described as relating to "standards," as you request. We will provide what information we can about these individuals as soon as possible, however as we discussed during our March 10 telephone conference, it will take some time to gather this information. We will then look into your request regarding further specificity as to our identification of lawyers listed on log entries related to "licensing."

With respect to the documents relating to "standards," please note that some of these documents were produced last week in the Van der Meer production, including Entry Nos. 3121, 3132, 18437, 21340, and 21341.

To clarify this issue, you misstate in your letter that Mr. Rosenthal said Philips had not yet verified that the individuals identified on Philips' Supplemental Privilege Log were attorneys. Rather, Mr. Rosenthal stated that we had to verify the precise titles and employers for the people identified as attorneys before we could provide that information to you.

HOWREY

Peter J. Kirk, Esq.
March 18, 2008
Page 5

We do appreciate your identification of specific entries you want us to provide information for, and we will do so in good faith merely as an attempt to narrow the parties' disputes.

Other Topics:

Philips does not understand Pantech's complaint regarding the size of the redactions on various documents produced by Philips. The size of the redaction is irrelevant: privilege attaches to handwritten notes of attorneys as either attorney-client privilege or attorney work-product. For the bases of Philips' claims of privilege, please see the descriptions of the documents on Philips' Supplemental Privilege Logs.

Sincerely,



Ann Marie Phillips

cc: Alan M. Grimaldi
Cecil E. Key
Brian A. Rosenthal

-----Original Message-----

From: send@mail.efax.com [<mailto:send@mail.efax.com>]

Sent: Tuesday, March 18, 2008 8:03 PM

To: Phillips, Ann Marie

Subject: Successful transmission to 16175428906. Re: U.S. Philips Corp. v. LGE, U.S. Philips Corp. v. Pantech

Dear Ann Marie Phillips,

Re: U.S. Philips Corp. v. LGE, U.S. Philips Corp. v. Pantech

The 6 page fax you sent through eFax Solutions to 16175428906 was successfully transmitted at 2008-03-19 00:02:48 (GMT).

The length of transmission was 288 seconds.

The receiving machine's fax ID: .

If you need additional assistance, please visit our online help center at <https://www.j2corporate.com/corp/twa/page/customerSupport>. Thank you for using the eFax Solutions service.

Best Regards,
eFax Solutions

Customer Service

Help: <https://www.j2corporate.com/corp/twa/page/customerSupport>

Tel: 1-323-817-3202

Email: corporatesupport@mail.efax.com

MPEG-4 Patent Licensing Model Description (dmff v. u)

Contents

m4if conditions
Issued US/EC/JP/Patents
Group Licensing Program
Open base discussion, or

March 25th 2000
T. Kogure / MEI

For Discussion Purpose only

T.Kogure.

1: Back Ground

- (1) MPEG-1. STD Version-1, completed
- (2) Some announcements of MPEG-4 Product
- (3) Profiles/conformance discussion continue
- (4) Industry Forum(m4if) launched
- (5) MPEG-4 Logo with specific profile name
- (6) Number of profiles = Number of Tools
=Number of essential patent holders
- (7) MPEG-2 Patent Group Entity (MPEGLA)

↑
Urgent set-up
the group entity

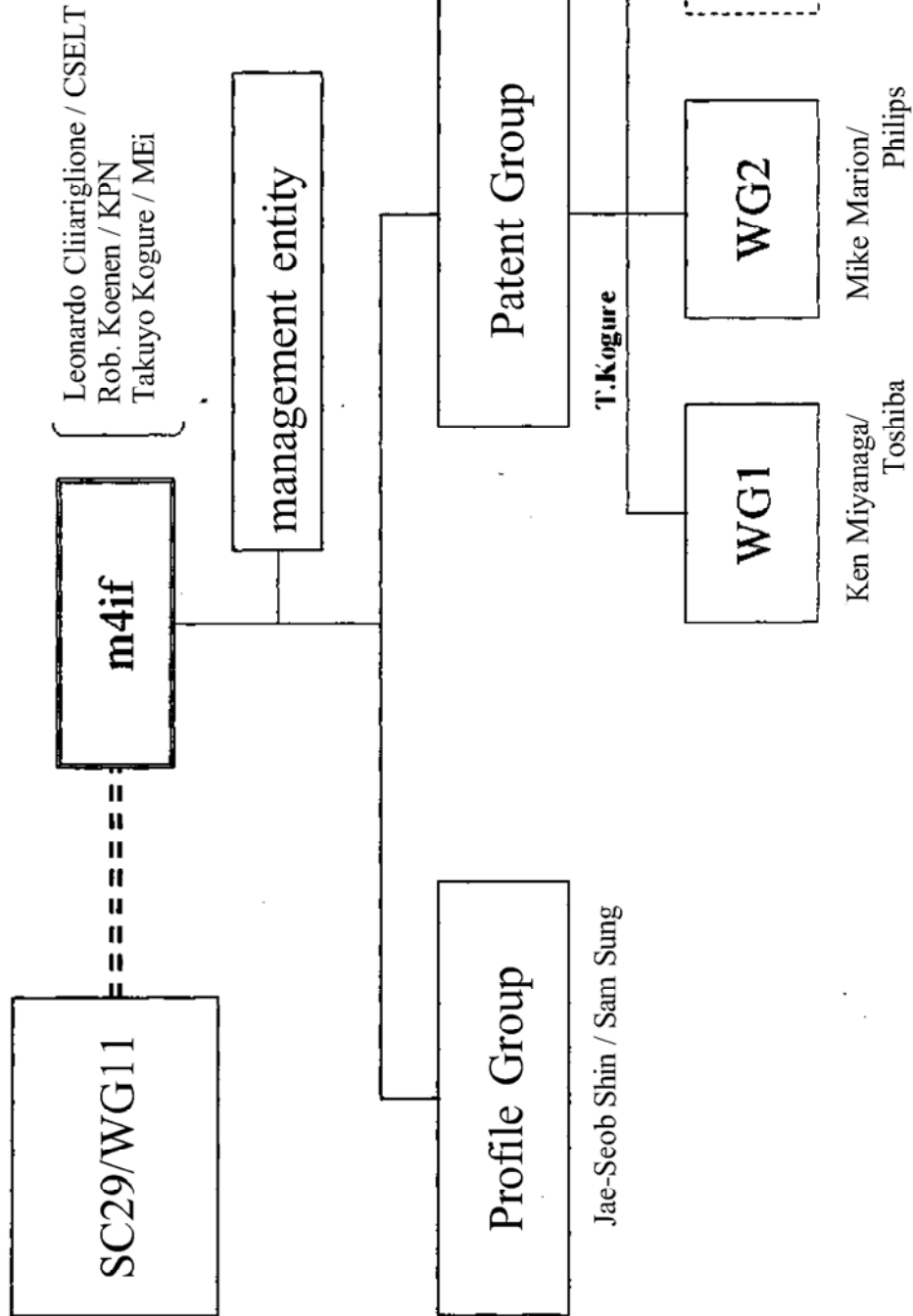
Then Effective rm4if group entity will start quickly.

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T.Kogure

3/10

m4if Patent Group Structure

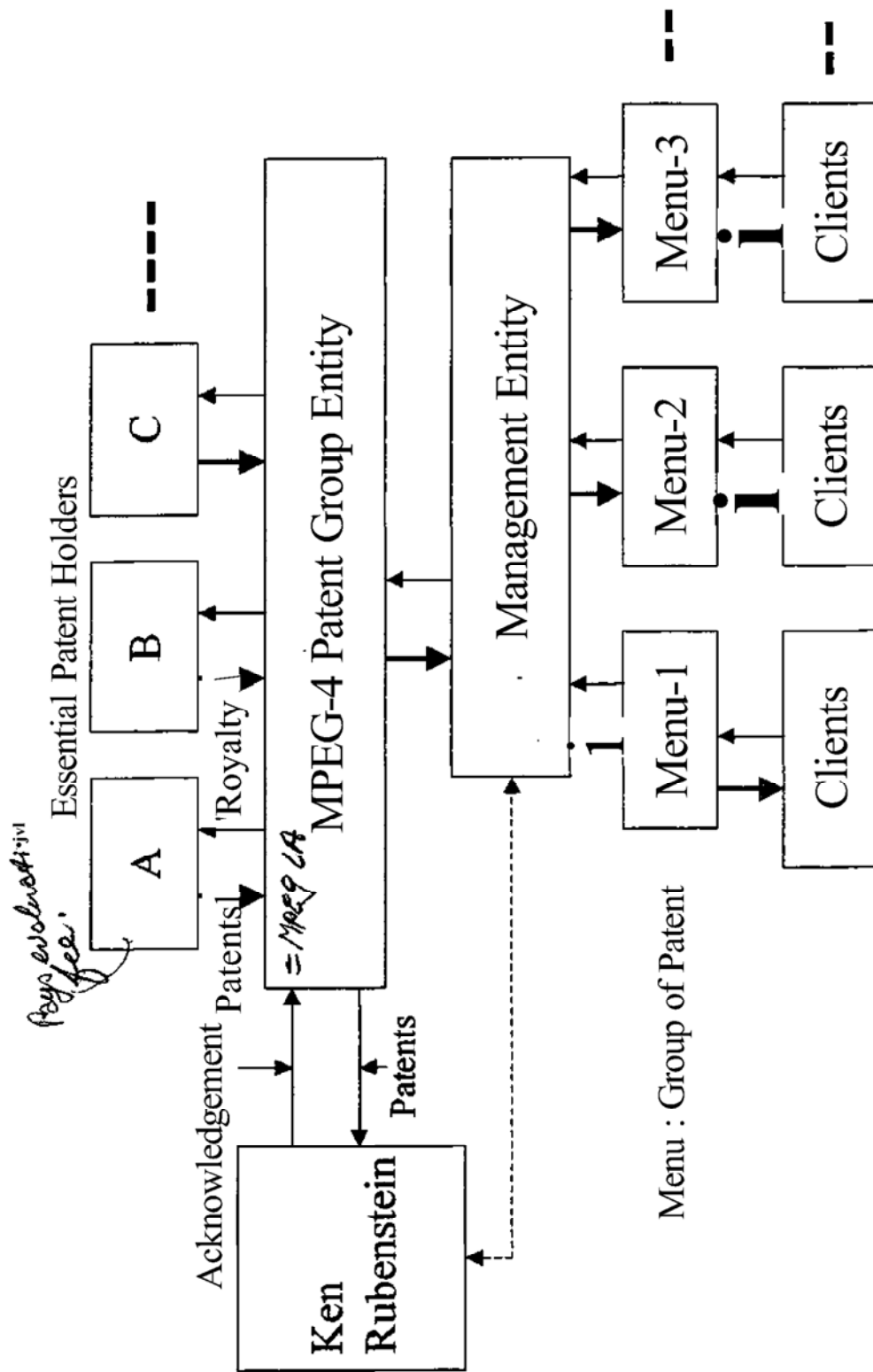


T.Kogure.

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Draft Structure of Patent Group Licensing

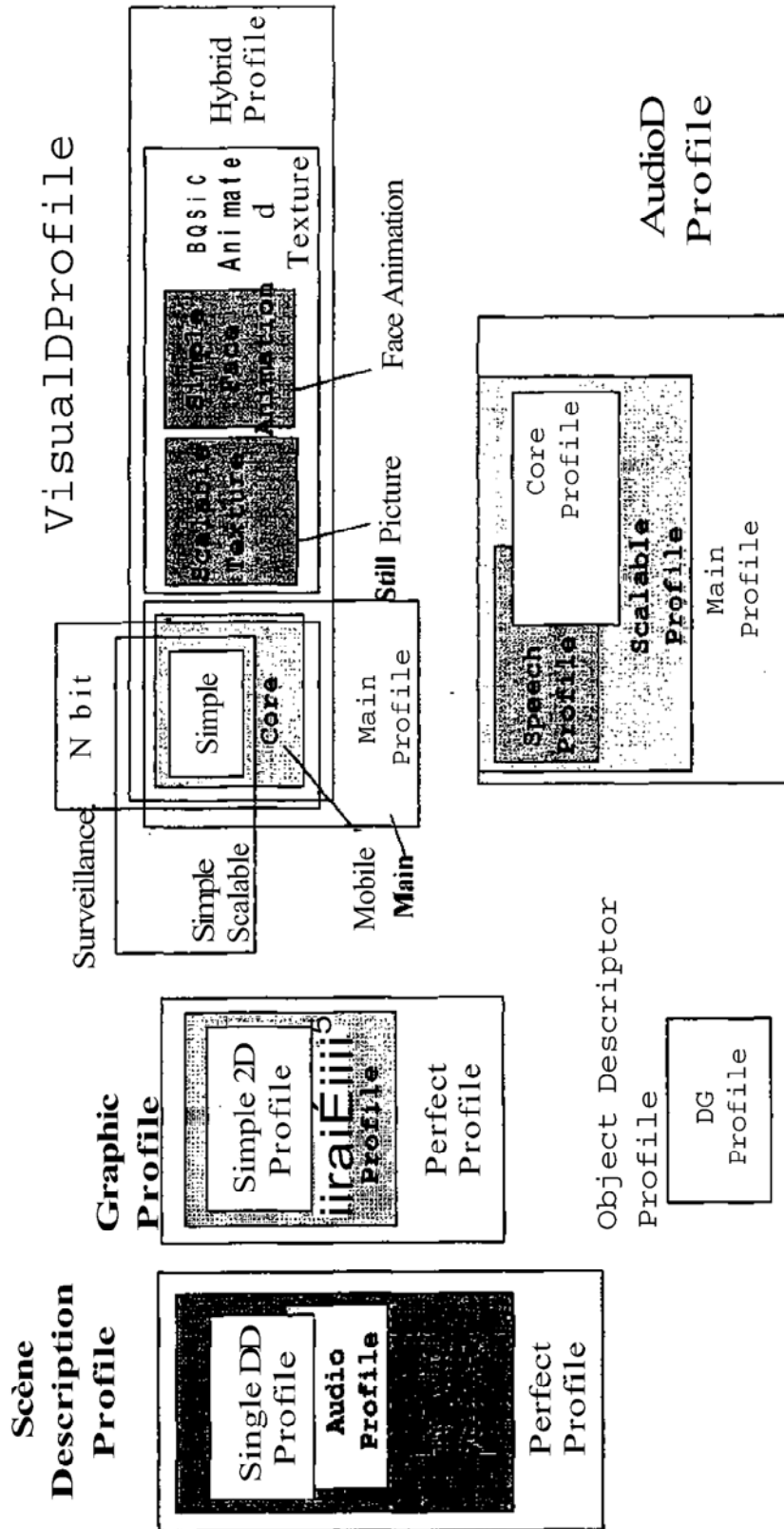


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MPEG-4 Profiles

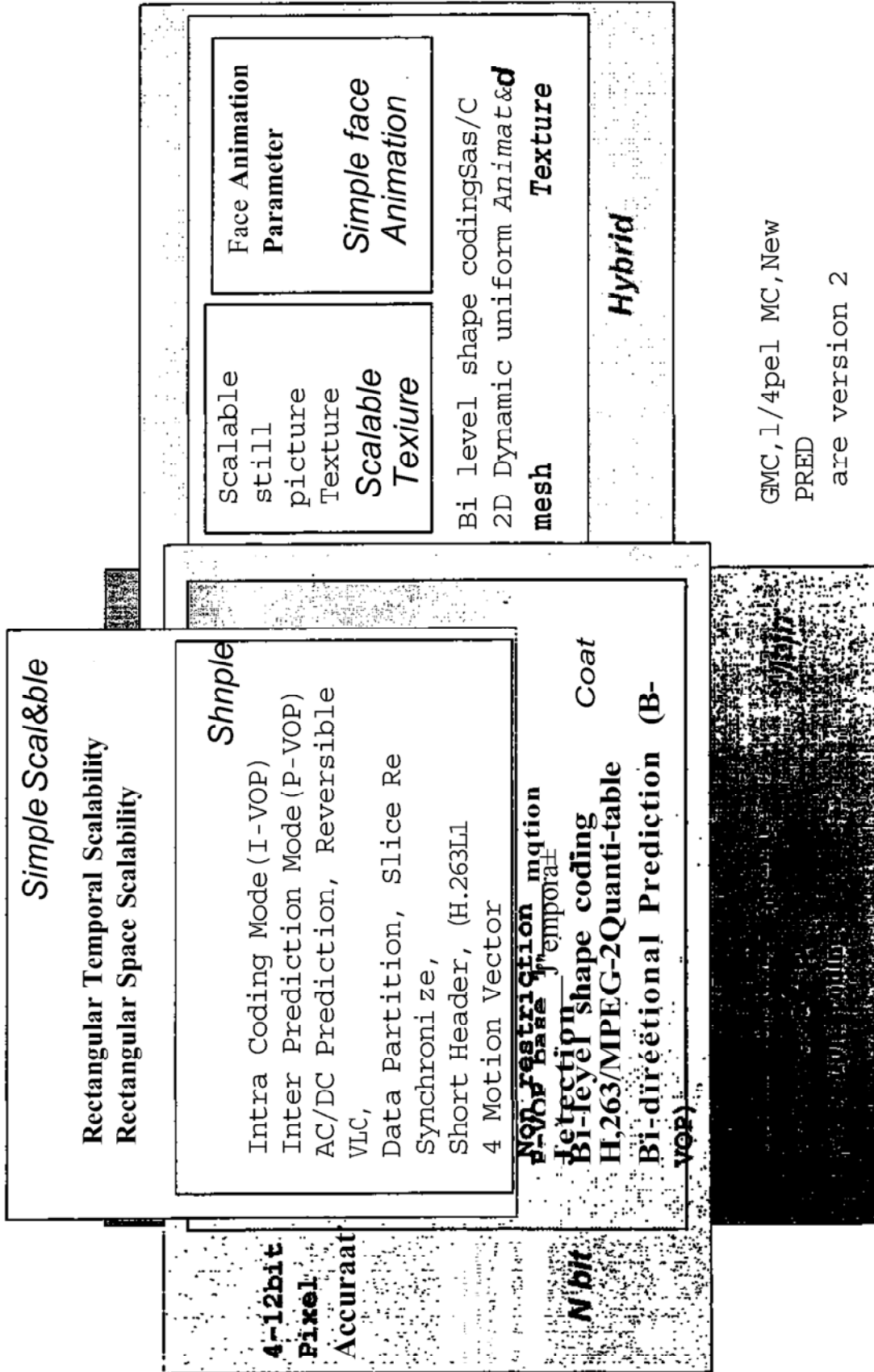


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Visual Profiles

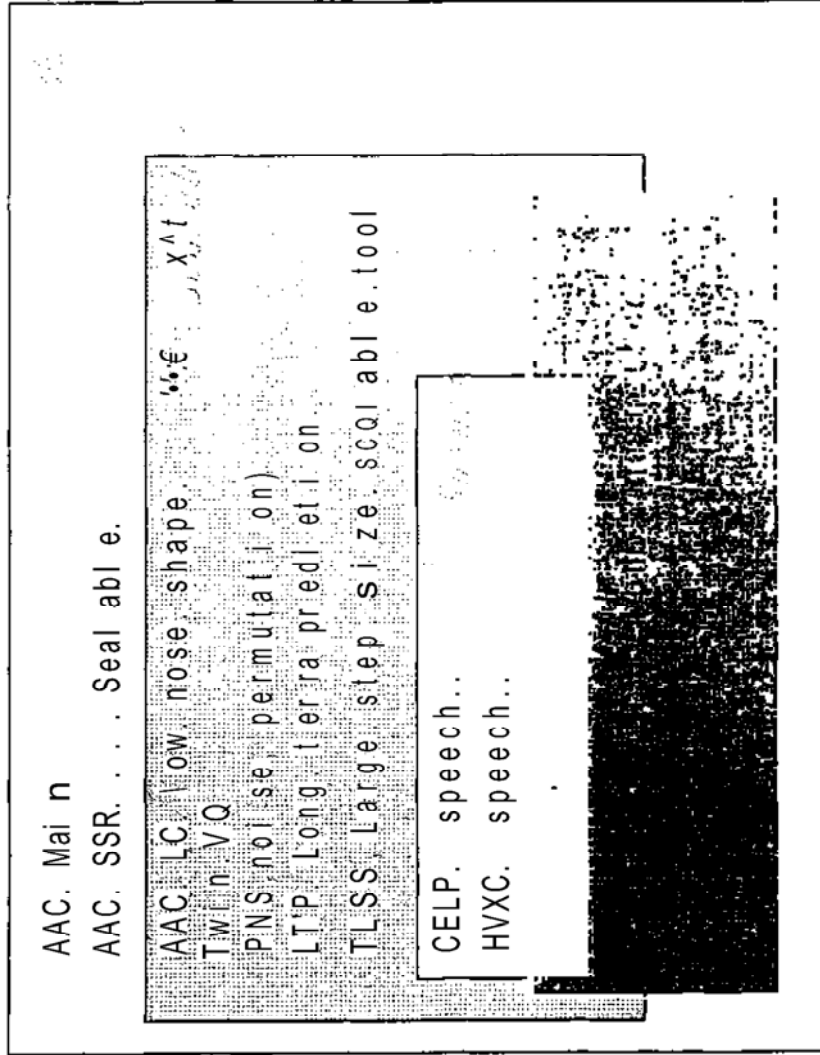


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Audio Profiles

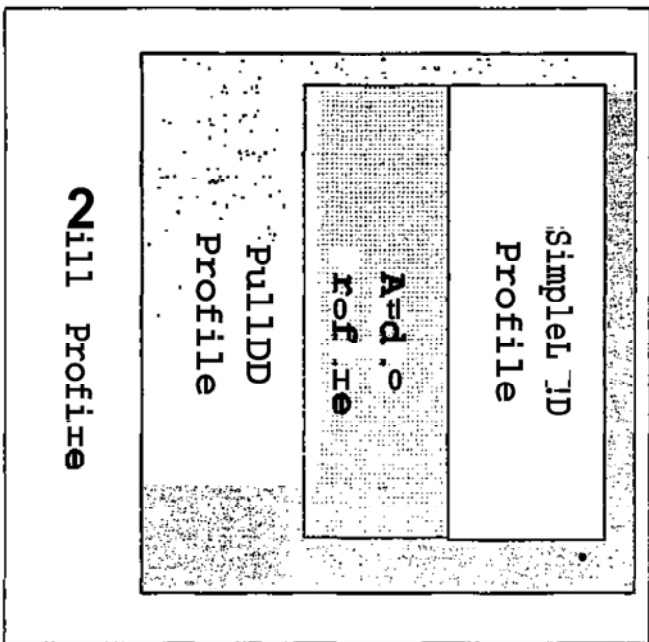


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T.Kogure

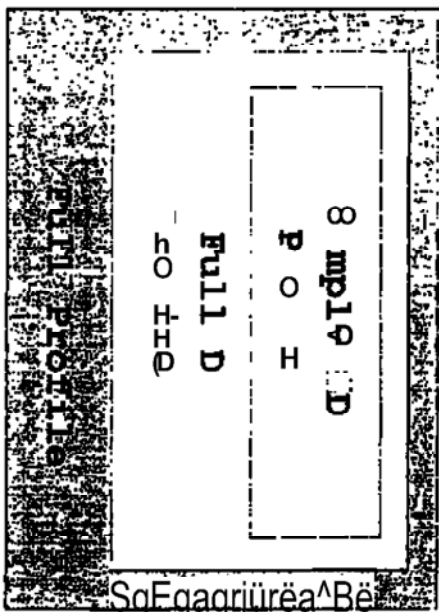
3. System Profile

1. **Definition of the problem.** The problem is to develop a system that can automatically generate a description of a given object or scene from a set of input data. This involves identifying the key features and relationships within the data and then translating them into a structured, human-readable format. The system should be able to handle various types of input data, such as images, text, or sensor readings, and produce a consistent and accurate description for each.

$$\begin{array}{c} \text{CO} \\ \text{O} \\ \text{(D)} \\ \text{(D)} \\ \text{P} \\ \text{O} \\ \text{H-H} \\ \text{H-H} \\ \text{(D)} \end{array} \quad \begin{array}{c} \text{rt} \\ \text{H} \\ \text{O} \\ \text{O} \\ \text{3} \end{array} \quad \begin{array}{c} \text{(D)} \\ \text{(O)} \\ \text{H} \\ \text{H} \\ \text{H} \end{array}$$


or discuss \vec{w} — 401

Grader Profi



Objekt Description on KOM(II)



T. Kogurs

9/10

Menu Structure(examples)

Don't keep profiles and
features & patents
to make it



	Video Profiles	Audio Profiles	Features
Menu-1	Simple, Core	None	Mobile
Menu-2	Simple, Core Simple Scalability	Speech	Video Phone
Menu-3	Main.	None	PDA
Menu-n		Scalable	STB
			Downloadable Terminal Unit

For Discussion Purpose only

T.Kogure

10/10

Discussion Items

- (1) Membership and Authentication
 - . Open base / Essential Patent holder only
- (2) Administrative Issue
 - . [m4if]Administrative statute
 - . Registration
 - . Structure patent acknowledgement
 - . Documentation
 - . Meeting Support function
- (3) Step for Set-up the group entity
 - . Patent Acknowledge process
 - . Structure configuration of patent group organization
 - . Next meeting schedule and some more
 - . Target date of effective

For Discussion Purpose only

T.Kogure.



1299 Pennsylvania Avenue, NW
Washington, DC 20004-2402
T 202.783.0800
F 202.383.6610
www.howrey.com

Direct Dial 202.383.7436

March 15, 2008

VIA FEDERAL EXPRESS

Peter J. Kirk, Esq.
Fish & Richardson P.C.
225 Franklin Street
Boston, MA 02110

Re: *U.S. Philips Corporation v. LG Electronics Inc., et al.*
Civil Case No.: 06-1402

U.S. Philips Corporation v. Pantech Wireless, Inc., et al.
Civil Case No.: 06-4583

Dear Peter,

Upon further review of the documents referenced in Section II.A. of Pantech's Motion to Compel filed February 29, 2008, I enclose unredacted copies of documents that were original redacted or withheld on the premise that Mr. Jan van der Meer was an attorney, including:

PH_PAN Bates Numbers	PH_LG Bates Numbers	Corresponding Entry on 2/29/08 Privilege Log
PH_PAN 0014940-955	PH_LG 0014956-971	1690
PH_PAN 0016439-441	PH_LG 0016455-457	1695
PH_PAN 0017610	PH_LG 0017626	1696
PH_PAN 0030341	PH_LG 0030357	1699
PH_PAN 0030344	PH_LG 0030360	1700
PH_PAN 0030370-372	PH_LG 0030386-388	1701
PH_PAN 0038112-115	PH_LG 0038128-131	2746
PH_PAN 0044160-162	PH_LG 0044176-178	3121
PH_PAN 0044550-561	PH_LG 0044566-577	3132
PH_PAN 0045759	PH_LG 0045775	3149
PH_PAN 0045760	PH_LG 0045776	3150
PH_PAN 0046157-158	PH_LG 0046173-174	3152
PH_PAN 0046372-373	PH_LG 0046388-389	3157
PH_PAN 0047333	PH_LG 0047349	3158
PH_PAN 0047453	PH_LG 0047469	3159
PH_PAN 0062798-799	PH_LG 0063022-023	4323
PH_PAN 0290609-610	PH_LG 0290609-610	18422

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MUNICH NEW YORK NORTHERN VIRGINIA PARIS SALT LAKE CITY SAN FRANCISCO TAIPEI WASHINGTON, DC



Peter J. Kirk, Esq.
March 15, 2008
Page 2

PH PAN Bates Numbers	PH LG Bates Numbers	Corresponding Entry on 2/29/08 Privilege Log
PH PAN 0290611-613	PH LG 0290611-613	18430
PH PAN 0290614	PH LG 0290614	18433
PH PAN 0290615-617	PH LG 0290615-617	18434
PH PAN 0290618	PH LG 0290618	18435
PH PAN 0290619	PH LG 0290619	18437
PH PAN 0280620-621	PH LG 0280620-621	18445
PH PAN 0290622-626	PH LG 0290622-626	18482
PH PAN 0290627-636	PH LG 0290627-636	19660
PH PAN 0290637	PH LG 0290637	19686
PH PAN 0290638	PH LG 0290638	19698
PH PAN 0290639	PH LG 0290639	19770
PH PAN 0290640	PH LG 0290640	21338
PH PAN 0290641-644	PH LG 0290641-644	21339
PH PAN 0290645-648	PH LG 0290645-648	21340
PH PAN 0290649	PH LG 0290649	21341
PH PAN 0290650-659	PH LG 0290650-659	351
PH PAN 0290660-662	PH LG 0290660-662	3147
PH PAN 0290663-672	PH LG 0290663-672	5031
PH PAN 0290673-674	PH LG 0290673-674	5145
PH PAN 0290675-682	PH LG 0290675-682	5234
PH PAN 0290683	PH LG 0290683	3158
PH PAN 0290684	PH LG 0290684	3158
PH PAN 0290685-687	PH LG 0290685-687	370
PH PAN 0290688-695	PH LG 0290688-695	393
PH PAN 0290701	PH LG 0290701	3139
PH PAN 0290702-704	PH LG 0290702-704	3140
PH PAN 0290705-706	PH LG 0290705-706	5059
PH PAN 0290707-714	PH LG 0290707-714	5067
PH PAN 0290715	PH LG 0290715	1689

As referenced above, these documents were originally withheld on the basis of attorney client privilege and/or attorney work-product as we understood that Mr. Jan van der Meer had obtained a legal degree.

HOWREY_{LLP}

Peter J. Kirk, Esq.
March 15, 2008
Page 3

The LG Production is produced pursuant to the Joint Protective Order, entered June 11, 2007. The Pantech Production is produced pursuant to the Joint Protective Order, entered June 20, 2007.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Marie Phillips", with a stylized flourish at the end.

Ann Marie Phillips

cc: Alan M. Grimaldi
Cecil E. Key
Brian A. Rosenthal